

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

ABDULLAHI HASHI (11))

CASE NO. 3:11-00132
JUDGE HAYNES

DEFENDANT ABDULLAHI HASHI'S MOTION TO SEVER

Defendant Abdullahi Hashi, by and through undersigned counsel, and pursuant to Rule 8(a), Rule 12(b)(3)(D) and Rule 14 of the Federal Rules of Criminal Procedure, does hereby move the Court for a severance in the trial of this action.¹

Specifically, Defendant Hashi requests that a severance be ordered as to Counts 15 through 24 of the Second Superseding Indictment. Defendant Hashi is charged in Count 1 of the Second Superseding Indictment with conspiracy to commit acts of sex trafficking in violation of 18 U.S.C. § 1591(a)(1) (the "recruits" provision). Defendant Hashi is also charged in Count 2 with a violation of 18 U.S.C. § 1591(a)(2) (the "benefits financially" provision). Finally, Defendant Hashi is charged in Counts 12 and 13 with substantive counts of sex trafficking and/or attempting to commit such acts in violation of 18 U.S.C. § 1591(a) and § 1594(a).

Counts 15 through 24 of the Second Superseding Indictment alleges various acts of theft, fraud and conspiracy to commit credit card fraud which Defendant Hashi has not been charged with in the indictment.

Defendant Hashi submits a memorandum of law.

¹ Defendant Hashi recognizes that much of the request for relief through the motion for severance is moot based on the Court's ruling on February 16, 2012 (See, Memorandum and Order, Docket Entry Nos. 1394 & 1395).